

REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed September 30, 2004. Claims 1 and 3 have been amended and Claim 6 has been added herein. Support for newly added claim 6 can be found, for example, in original claims 1-3. No new matter has been entered. Upon entry of the enclosed claims amendment, claims 1-6 remain pending in the present application.

In the Office Action, claims 1-2 have been preliminarily rejected based on obviousness under 35 U.S.C. § 103. The Applicants traverse all of the rejections of the Office Action. Applicants appreciate the Examiner's review of the above-identified patent application and respectfully request reconsideration and allowance in view of the above amendments and following remarks.

I. Response to Claim Rejections Based on Obviousness

In the Office Action, claims 1-2 have been preliminarily rejected as obvious under 35 U.S.C. § 103. Specifically claims 1-2 have been rejected under 35 U.S.C. § 103 by U.S. Patent No. 6,751,310 to Crossley (hereinafter, "Crossley") in view of U.S.

patent No. 6,490,350 to McDuff et al. (hereinafter, "McDuff").

A. Claim 1

Applicants' claim 1 recites,

A computerized telephony dynamic paging system comprising:

a paging system database containing properties associated with at least **one system user contact party** and at least one trigger condition;

a condition monitor, adapted to monitor conditions of a call campaign being processed by a computer telephony system, to detect at least one trigger condition;

a pager telephone call processor, responsive to a detected trigger condition and said paging system database, for generating and processing a pager telephone call upon the detection of said at least one trigger condition; and

a pager graphical user interface (P-GUI), for facilitating the control of said dynamic paging system by a system user.

(Emphasis Added)

The Applicants respectfully submit that the cited references Crossley in view of McDuff fail to suggest all elements of the rejected claim for at least the reasons that follow. Crossley discloses a telephony resource server (Element 12 in Figure 1 of Crossley). The telephony resource server obtains a group of call records from a database (Element 21 in Figure 1 of Crossley). The call records of Crossley are associated with customers or participants of the telephony campaign. Applicants

claim a paging system database containing properties associated with at least **one system user contact party**. The Examiner has read the call records associated with customers of the telephony campaign onto the contact parties of Applicants' claimed invention.

Crossley uses the call records to contact customers of the campaign. This does not disclose Applicants' claimed invention of notifying system user contact parties. The contact parties of Applicants' invention and as disclosed by Applicants' specification are individuals responsible for the operation of the telephony campaign, for example, but not limited to, supervisors, managers, operators, or agents. Crossley does not disclose nor would it make any sense that the operators or users of the telephony resource server would also be customers of the telephony campaign. McDuff does not disclose a database of system user contact parties and thus does not cure this deficiency. Therefore, Applicants request that the Examiner withdraw the rejection of claim 1.

B. Claims 2-3

The Applicants respectfully submit that since claims 2-3

depend on independent claim 1, claims 2-3 contain all limitations of independent claim 1. Since independent claim 1 should be allowed, as argued above, pending dependent claims 2-3 should be allowed as a matter of law for at least this reason. In re Fine, 5 U.S.P.Q.2d 1596, 1608 (Fed. Cir. 1988).

II. Newly Added Claim

Claim 6 has been added. The Examiner acknowledged on pages 3 and 4 of the Office Action that claim 3 and the corresponding dependent claims contain allowable subject matter. Newly added claims 6 includes allowable elements of claims 1-3. The Applicants believe newly added claim 6 is patentable over the cited references and respectfully request allowance.

III. Prior Art Made of Record

The prior art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.


CONCLUSION

In light of the foregoing amendments and for at least the

reasons set forth above, Applicants respectfully submit that all objections and rejections have been traversed, rendered moot and/or accommodated, and that presently pending claims 1-6 are in condition for allowance. Favorable reconsideration and allowance of the present application and the presently pending claims are hereby courteously requested. The examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

Respectfully submitted,

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Date: 1-28-05